Hospital and Eligible Professional (EP) registration details: Guidance for CMS and ONC to share publicly

Summary

The following provides registration instructions are related to selecting their provider-type and (as needed) selecting a state. This applies to each type of hospital (Medicare, Medicaid, or both Medicare and Medicaid) and also for eligible professionals (Medicare and Medicaid).

Eligible professionals

We wish to provide some clarifying information for the EHR Incentive Program registration process for eligible professionals. The following clarification primarily impacts Medicaid eligible professionals. Registration began January 3 and you can register by visiting www.cms.gov/EHRIncentivePrograms

Eligible professionals must select between the Medicare and Medicaid EHR Incentive Programs. If you are participating in the Medicare EHR Incentive Program, you should select "Medicare" from the registration screen and follow the subsequent directions.

If you are selecting the Medicaid EHR Incentive Program, when you select "Medicaid" on the registration screen, you will be asked to select a state from the drop-down menu. Only states with launched programs (i.e., they are prepared to confirm your eligibility and make payments) are listed in that drop-down menu. Each month, CMS will add new states to the drop-down menu as they launch programs. If you have questions about when your state will launch, please check here. You may also contact your State Medicaid Agency for more information about the program. Visit the CMS website for the Medicaid EHR Incentive Program contacts at the State Medicaid Agency.

Proxy rights for EPs registering has also been a hot issue of late.

"At this time there is no method available for a third party to register multiple EPs for the Medicare and Medicaid EHR Incentive Programs. Beginning in May, CMS plans to implement functionality that will allow an EP to designate a third party to register and attest on his or her behalf. We will release detailed information about that process when it is available. Please be aware that currently EPs are not permitted to allow a practice manager or any other person to register in their place. Sharing your National Plan and Provider Enumeration System (NPPES) user ID and password with third parties can place your information at risk. Until CMS implements new functionality in May, each EP should register himself or herself separately for the Medicare and Medicaid EHR Incentive Programs."

Hospitals Eligible for Both Medicare and Medicaid EHR Incentive Payments

We wish to provide some clarifying information for the EHR Incentive Program registration process for hospitals eligible for both the Medicare and Medicaid incentives. Registration began January 3 and you can register by visiting www.cms.gov/EHRIncentivePrograms

Background: Acute care hospitals may be eligible for both Medicare and Medicaid EHR Incentive Programs. These hospitals meet all of the following criteria:

- Are a subsection(d) hospital in the 50 U.S. States or the District of Columbia *or* you are a Critical Access Hospital (CAH); *and*
- Have a CMS Certification Number ending in 0001-0879 or 1300-1399; *and*
- Have 10% of your patient volume derived from Medicaid encounters.

You are receiving this note because we believe that you are working with a hospital which might be eligible for both the Medicare and Medicaid EHR Incentive Programs (i.e., could receive money under both programs).

If you meet all of the criteria above, you should register as "Both Medicare & Medicaid" when asked for hospital type on the registration **even if you are unsure that you will meet both programs' requirements in the first year.** Also, please **make sure you have contacted your State Medicaid Agency and fully understand the requirements for what it means to have 10% Medicaid patient volume** (e.g., this is <u>not</u> a revenue calculation). Since you could be eligible for both Medicare and Medicaid EHR Incentive Payments, it is best to check if you are unsure.

After selecting "Both Medicare & Medicaid," as your hospital type, please select your state from the drop-down menu on the registration screen. If your state's program has not yet launched at the time of your registration, your Medicaid registration will be placed into a "Pending State Validation" status until your state's program is launched. You will not be able to complete the Medicaid program eligibility requirements or receive a Medicaid incentive payment until your state's program is launched. For a list of expected program launch dates, please visit the [CMS website](). You may, however, continue with registration and attestation for the Medicare program in April. If the state has not launched its program by May when Medicare EHR incentive payments are to be issued, hospitals that have successfully attested under Medicare will still be paid under Medicare. Their Medicaid registration will remain in a "Pending State Validation" until the state launches its program.

When your state's program is launched, you will be notified by your state to complete the additional information to confirm your Medicaid eligibility. If successful, you will receive a payment from your state as well.

You may modify your program registration details, including whether you are registering for "Medicare", "Medicaid", or "Both Medicare and Medicaid" until you complete the attestation process. After completing the attestation process, your registration is locked for that payment year. You may change your program affiliation (i.e., whether you are registering for "Medicare", "Medicaid", or "Both Medicare and Medicaid") in subsequent payment years, if needed.

Finally, all hospitals must have a current enrollment record in the Provider Enrollment, Chain and Ownership System (PECOS). If you are registering for the Medicare and Medicaid incentives, this record must also reflect that you have a specialty type of "acute" or "critical access." You can check your PECOS 855A enrollment form to verify your specialty type. If you do not have an enrollment record in PECOS, now is the time to set up your record. The best way to submit your application is through [internet-based PECOS](). If you have submitted a PECOS enrollment application within the last 90 days, your enrollment application has been accepted for processing and you do not need to take any additional actions based on this message.

If you have any further questions, please visit the CMS EHR Incentive Program website at [www.cms.gov/EHRIncentivePrograms]()

Hospitals eligible for Medicare (only) EHR Incentive Payments

We wish to provide some clarifying information for the EHR Incentive Program registration process for hospitals only eligible for the Medicare incentives. Registration began January 3 and you can register by visiting www.cms.gov/EHRIncentivePrograms

You are receiving this note because we believe that you might be working with a hospital which is only eligible for the Medicare EHR Incentive Program (and not eligible for the Medicaid EHR Incentive Program). Hospitals that fall into this category include:

- Subsection(d) acute care hospitals with less than 10% Medicaid patient volume; or
- Critical Access Hospitals (CAHs) with less than 10% Medicaid patient volume.

If you fall into the "Medicare-only" group listed above, when registering for the program you should select "Medicare-only" for your hospital type. **Please make sure you have contacted your State Medicaid Agency and fully understand the requirements for what it means to have 10% Medicaid patient volume** (e.g., this is not a revenue calculation). You could be eligible for both Medicare and Medicaid EHR incentive payments, so it is best to check if you are unsure.

Background: Acute care hospitals may be eligible for <u>both</u> Medicare and Medicaid EHR Incentive Programs. These hospitals meet all of the following criteria:

- Are a subsection(d) hospital in the 50 U.S. States or the District of Columbia or are a Critical Access Hospital (CAH); *and*
- Have a CMS Certification Number ending in 0001-0879 or 1300-1399; *and*
- Have 10% of your patient volume derived from Medicaid encounters.

When you go to register, you should select "Medicare-only" on the registration screen. After successfully completing your registration, you will receive a confirmation number. In order to receive a payment, you must return to the website in April to complete the meaningful use attestation.

You may modify your program registration details, including whether you are registering for "Medicare", "Medicaid", or "Both Medicare and Medicaid" until you complete the attestation process. After completing the attestation process, your registration is locked for that payment year. You may change your whether you are registering for "Medicare", "Medicaid", or "Both Medicare and Medicaid" in subsequent payment years, if needed.

Finally, all hospitals must have a current enrollment record in the Provider Enrollment, Chain and Ownership System (PECOS). If you are registering for the Medicare incentives only, this record must also reflect that you have a specialty type of "acute" or "critical access." You can check your PECOS 855A enrollment form to verify your specialty type.

If you do not have an enrollment record in PECOS, now is the time to set up your record. The best way to submit your application is through internet-based PECOS. If you have submitted a PECOS enrollment application within the last 90 days, your enrollment application has been accepted for processing and you do not need to take any additional actions based on this message.

If you have any further questions, please visit the CMS EHR Incentive Program website at
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<u>Hospitals eligible for Medicaid (only) EHR Incentive Payments</u>

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process for hospitals only eligible for the Medicaid incentives. Registration began January 3
and you can register by visiting www.cms.gov/EHRIncentivePrograms

**You are receiving this note because we believe that you are working with a
hospital which is only eligible for the Medicaid EHR Incentive Program** (and not
eligible for the Medicare EHR Incentive Program). Hospitals that fall into this category
include:

- Children's hospitals;
- Cancer hospitals; or
- Acute care hospitals in the U.S. territories.

Background: Acute care hospitals may be eligible for <u>both</u> Medicare and Medicaid EHR
Incentive Programs. These hospitals meet all of the following criteria:

- Are a subsection(d) hospital in the 50 U.S. States or the District of Columbia or you
  are a Critical Access Hospital (CAH); *and*
- Have a CMS Certification Number ending in 0001-0879 or 1300-1399; *and*
- Have 10% of your patient volume derived from Medicaid encounters.

If you fall into the "Medicaid-only" group listed above, when registering for the program you
should select "Medicaid-only" for your hospital type. You will see a list of states in a drop
down menu and you must select a state. Please select your state from the drop-down menu
on the registration screen. If your state's program has not yet launched at the time of your
registration, your file will be placed into "Pending State Validation" status until your state's
program is launched. You will not be able to complete your program eligibility requirements
or receive an incentive payment until your state's program is launched. For a list of
expected program launch dates, please click here.

You may modify your program registration details, including whether you are registering for
"Medicare", "Medicaid", or "Both Medicare and Medicaid" until you complete the attestation
process. After completing the attestation process, your registration is locked for that
payment year. You may change your whether you are registering for "Medicare",
"Medicaid", or "Both Medicare and Medicaid" in subsequent payment years, if needed.

Finally, all hospitals must have a current enrollment record in the Provider Enrollment,
Chain and Ownership System (PECOS). If you do not have an enrollment record in PECOS,
now is the time to set up your record. The best way to submit your application is through
internet-based PECOS by clicking here. If you have submitted a PECOS enrollment
application within the last 90 days, your enrollment application has been accepted for
processing and you do not need to take any additional actions based on this message.

If you have any further questions, please visit the CMS EHR Incentive Program website at
www.cms.gov/EHRIncentivePrograms